

## **REMARKS**

The Examiner is thanked for the performance of a thorough search, for the careful reading of the disclosure, and for considering the references included in the Information Disclosure Statement filed on January 4, 2002.

Claims 7 and 20 have been amended. No claims have been cancelled or added. Hence, Claims 1-29 are pending in the application.

The amendments to Claims 7 and 20 have been made to correct typographical errors and not for the purpose of overcoming alleged prior art.

Each issue raised in the Office Action mailed December 15, 2004 is addressed hereinafter.

### **I. DRAWING AMENDMENT**

The Applicants respectfully request approval of the amendment to FIG. 5A as depicted in the drawing sheets attached to this paper. Included are both a red-line version of FIG. 5A, which is labeled “Annotated Marked-up Drawing Sheet”, and a new sheet that is labeled “Replacement Drawing Sheet” and that includes FIG. 5A as amended.

The proposed amendment changes the reference numeral of “NETBIOS-ENABLED NAPT PROCESS” from “400” to “500”. Support for this amendment is found in paragraph [0050] in the specification as originally filed. Thus, no new matter is introduced by the proposed amendment to FIG. 5A, which is merely conformed to the original specification.

### **II. ISSUES NOT RELATING TO PRIOR ART**

#### **A. OBJECTIONS TO THE SPECIFICATION**

The specification has been objected to because of an informality. Paragraph [0084] is amended to conform to the original drawings by indicating that step 552 is depicted in FIG. 5C.

## B. OBJECTIONS TO THE DRAWINGS

The drawings have been objected to because of several referencing informalities. This objection is addressed by amending the specification. Specifically, paragraph [0047] is amended to refer to numeral “200”, paragraph [0117] is amended to refer to numeral “620”, and paragraph [0084] is amended to refer to numerals “310” and “312”. The amendments to the specification have been made to conform the specification to the original drawings, and, therefore, do not introduce new matter in the present application.

The drawings have also been objected to because they did not include reference numeral “500” mentioned in the description, and because reference numeral “400” was used to designate both “NAPT Router” and “NETBIOS-ENABLED NAPT PROCESS”. This objection is addressed by the Drawing Amendment discussed above.

## C. OBJECTIONS TO THE CLAIMS

Claim 7 has been objected to because of a typographical error. Claim 7 is amended herein to replace the semi-colon (;) with a period (.).

For the reasons given above, reconsideration and withdrawal of the objections to the Specification, the Drawings, and the Claims is respectfully requested.

## II. ISSUES RELATING TO THE CITED ART

### A. INDEPENDENT CLAIM 1

Claim 1 has been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by March et al., U.S. Patent Application No. US 2003/0007486 (“MARCH”). The rejection is respectfully traversed.

Among other features, Claim 1 recites:

...  
determining whether the first packet includes a first message that registers a first resource on the first device with a protocol server for a particular protocol, the protocol server available at the second device on the second network; and

if it is determined that the first packet includes the first message registering the first resource, then  
determining first information in the first message for uniquely requesting the first resource, and  
storing data indicating the first information in a first data structure in association with the first address.

It is respectfully submitted that MARCH does not disclose these features of Claim 1.

1. MARCH does not describe determining whether a packet received at an intermediary device, from a first device, includes a message that registers a first resource on the first device with a protocol server that is available at a second device in a second network.

The Office Action does not specify exactly what in MARCH corresponds to or constitutes each feature of the claims. In an Office Action, “the particular part relied on must be designated as nearly as practicable ... The pertinence of each reference, if not apparent, must be clearly explained ...” (MPEP §707, citing 37 C.F.R. §1.104(c)(2)), and “the particular figure(s) of the drawings(s), and/or page(s) or paragraph(s) of the reference(s), and/or any relevant comments briefly stated should be included.” (MPEP §707). The present citations to the references and the very brief explanations in the Office Action do not provide the Applicants with adequate notice or reasonable particularity with respect to the basis of the rejections. Instead, large portions of the references are simply identified in a non-specific way. In particular, the Office Action does not identify what in MARCH constitutes a first device in a first network, an intermediary device, and a second device in a second network. As a result, the Applicants have had to engage in guesswork to determine the basis of the rejection.

As best understood by the Applicants, the Office Action asserts, in page 5, that “an application server receives a packet from user or device in the same network.” Apparently, the Office Action considers: (1) that application server 42 in FIG. 1 of MARCH corresponds to the

intermediary device of Claim 1, and (2) that a user or device “on the public network 14 or on private network 50” corresponds to the first device of Claim 1 (see MARCH, paragraph [0024]).

Further, the Office Action asserts, in page 5, that “a message is sent to the second application server of a second network.” To support this assertion, the Office Action cites FIG. 1, and paragraphs [0006], [0007], [0024], and [0126] to [0153] of MARCH. As best understood by the Applicants, with respect to FIG. 1 of MARCH, the Office Action asserts that application server 42 sends a message to application server 43. (See MARCH, paragraph [0140]).

The Office Action, however, completely fails to identify what in MARCH constitutes a first resource on the first device in the first network.

For the feature of Claim 1 of determining whether the first packet includes a first message that registers a first resource on the first device with a protocol server available at the second device on the second network, the Office Action, in page 5, states that “parsing determines if the EndpointId includes information for a resource with a particular protocol – audio, video, or other media; the database server stores information registering devices.” To support this assertion, the Office Action cites the following paragraphs from March: [0022], [0024], [0032]-[0035], [0041]-[0054], [0070]-[0084], and [0142]. In other words, the Office Actions seems to assert that the EndpointId parameter includes information related to or indicating a resource.

Neither any of the above-cited paragraphs, nor anything else in MARCH, describes a first resource on a first device in a first network. Further, they do not describe including a message in a packet that registers the resource with a protocol server for a particular protocol that is available at the second device as featured in Claim 1.

As mentioned above, the Office Action asserts that a user or a device in MARCH corresponds to the first device of Claim 1, a first application server corresponds to the

intermediary device of Claim 1, and a second application server in MARCH corresponds to the second device of Claim 1. But to show the above-recited feature of Claim 1, the Office Action would also need to show that the first application server in MARCH receives a message to register a resource of the user or the device for a protocol server that is available on the second application server. The Office Action does not do so.

MARCH does not describe anything even remotely related to registering a resource in a first network that can be used by a protocol server in a second network. What MARCH describes are enhancements to the Media Gateway Control Protocol (MGCP) Version 1.0, which is defined in RFC 2705. (MARCH, paragraph [0031]). In particular, MARCH states that

Enhancements to the MGCP messages are added to support transport of certain types of data between the media portal 44 or 45 and the application server 42 or 43. The enhancements include the introduction of a new format for a **parameter (EndpointId) used to identify endpoints** and a parameter (referred to as X+NAPTAddressType) to specify the type of network mapping.

With respect to the EndpointId parameter, MARCH states that a value of “A:1000@47.1.1.1” indicates that an endpoint (a user or a device) of “Audio” type is found at port “1000” of address “47.1.1.1” (see MARCH, paragraphs [0041], [0049] and [0053].) Thus, contrary to the assertion in the Office Action, the EndpointId parameter does not include any information regarding any resource of a user or a device, but rather **identifies the type** of the user or the device itself. Further, the EndpointId is an enhancement to an existing protocol that is used to **support transport of certain types of data** and not to provide support for identifying resources on devices.

Since MARCH does not show anything that is even remotely related to identifying a resource on a device, MARCH cannot possibly show the feature of determining whether a packet sent to a first application server includes a message that registers a resource of a user or a device

in the first network with a protocol server for a particular protocol that is available on a second application server.

2. MARCH does not describe determining a first information in the first message for uniquely requesting the first resource, and storing data indicating the first information in a first data structure in association with the address of the first device.

The Office Action does not specifically identify, and the Applicants cannot determine, what in MARCH corresponds to the resource on the first device of Claim 1. Further, by citing paragraphs [0120], [0126], [0141] and [0142] the Office Action seems to make a loose association between MARCH's X+NAPTAddressType parameter and a first information for requesting the resource. Such association, however, is incorrect.

MARCH describes that the X+NAPTAddressType parameter is used to identify the type of the network mapping. (See MARCH, paragraph [0031].) In particular, the “predetermined X+NAPTAddressType parameter is included in the MGCP CreateConnection message to **identify the different types (internal or external) of endpoints.**” (MARCH, paragraph [0089], emphasis added.) Further, in paragraph [0102] MARCH states that

**[t]he parameter X+NAPTAddressType specifies the type of NAPT address for a specific endpoint, either “INT” (Internal) or “EXT” (external).** If the X+NAPTAddressType parameter is omitted, the default value of the NAPTAddressType for both the originating endpoint and the terminating endpoint is “EXT.” (Emphasis added.)

In other words, the X+NAPTAddressType parameter is used in a message to identify whether the addresses of the users or devices in the MARCH system (e.g. the endpoints in a call) are internal or external to the network on which the users or devices initiated or received the call. Hence, the X+NAPTAddressType parameter identifies whether an address is internal or external,

and therefore cannot possibly include information for requesting a resource from a user or device.

Furthermore, since MARCH does not disclose first information for requesting a first resource from a first device, MARCH cannot possibly describe storing data indicating the first information in a first data structure in association with the address of the first device.

For the reasons given above, MARCH does not teach all of the features in Claim 1. Thus, Claim 1 is not anticipated under 35 U.S.C. § 102(e) by MARCH, and reconsideration and withdrawal of the rejection is respectfully requested.

B. INDEPENDENT CLAIMS 26, 28, AND 29

Independent claims 26, 28, and 29 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by MARCH. Claims 26, 28, and 29 include features similar to the features of Claim 1 discussed above. For this reason, it is respectfully submitted that Claims 26, 28, and 29 are patentable under 35 U.S.C. § 102(e) over MARCH for at least the reasons given above with respect to Claim 1.

C. INDEPENDENT CLAIMS 16 AND 27

Independent Claims 16 and 27 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by MARCH. Some of the features of Claims 16 include:

...  
determining whether the first packet includes a first message requesting a resource according to a particular protocol; and  
if it is determined that the first packet includes the first message requesting the resource, then  
determining first information in the first message for uniquely requesting the resource, and  
before said step of sending the second packet, determining the translated address on the first network based on a data item in a first data structure, the data item indicating the translated address and the first information.

The Office Action fails to identify what in MARCH constitutes a first device not in a first network, an intermediary device, and a second device in the first network as featured in Claim 16. As best understood by Applicants, the Office Action asserts that that a user or a device in MARCH corresponds to the first device of Claim 16, a first application server corresponds to the intermediary device of Claim 16, and a second application server established in a first network corresponds to the second device of Claim 16. But to show the above-recited feature of Claim 16, the Office Action needs to show that the first application server in MARCH receives a message from the user or device not in a first network requesting a resource according to a particular protocol from a second application server in the first network. The Office Action does not do so.

The Office Action asserts, in page 6, that “parsing determines whether the EndpointId includes information for a resource with a particular protocol – audio, video, or other media.” Further, the Office Action fails to identify what in MARCH corresponds to the resource that is being requested. As best understood by Applicants, the Office Action seems to assert that the EndpointId parameter included in a MGCP ModifyConnection message somehow identifies an audio, video, or other media resource. (See MARCH, paragraph [0110].) This is incorrect.

The EndpointId parameter does not include any information regarding any resource of an application server, but rather **identifies the type** of the terminating network address. For example, in paragraph [0070] MARCH describes that the EndpointId parameter indicates that the type of the terminating network address and port is “Audio”. Furthermore, the EndpointId is an enhancement to an existing protocol that is used to **support transport of certain types of data** and not to provide support for requesting resources.

Therefore, since MARCH does not show anything that is even remotely related to requesting a resource on a device, MARCH cannot possibly show the feature of determining



whether a packet sent to a first application server includes a message requesting a resource according to a particular protocol.

Claim 16 also features determining first information in the first message for uniquely requesting the resource. The Office Action seems to assert that the X+NAPTAddressType parameter includes information that may be used to request a resource. However, the X+NAPTAddressType parameter is used in a message to identify whether the addresses of the users or devices in the MARCH's system (e.g. the endpoints in a call) are internal or external to a particular network. (See MARCH, paragraph [0126].) Hence, the X+NAPTAddressType parameter only indicates whether an address is external or internal, and therefore cannot possibly include information for requesting a resource from a user or device.

Furthermore, since MARCH does not disclose first information for requesting a first resource, MARCH cannot possibly describe the feature of Claim 16 of determining the translated address on the first network based on a data item that indicates the translated address and the first information.

For the reasons given above, MARCH does not teach all of the features in Claim 16. Thus, Claim 16 is not anticipated under 35 U.S.C. § 102(e) by MARCH, and reconsideration and withdrawal of the rejection is respectfully requested. Furthermore, Claim 27 includes features similar to the features of Claim 16, and for this reason, it is respectfully submitted that Claim 27 is patentable under 35 U.S.C. § 102(e) over MARCH for at least the reasons given above with respect to Claim 16.

D. DEPENDENT CLAIMS 2-15 AND 17-25

Claims 2-7, 13-14, 17-19, and 22-24 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by MARCH. Claims 8-12, 15, 20-21, and 25 have been rejected as

allegedly unpatentable under 35 U.S.C. § 103(a) over MARCH in view of Gurijala et al., U.S. Patent No. 6,601,090 (“GURIJALA”).

Claims 2-15 and 17-25 are dependent upon claims 1 and 16, respectively, and thus include each and every feature of the corresponding independent claim. Furthermore, in rejecting Claims 8-12, 15, 20-21, and 25 the Office Action relies explicitly on MARCH, and not on GURIJALA, to show the features discussed above with respect to Claims 1 and 16. Because MARCH does not teach the subject matter of Claims 1 and 16, any combination of MARCH with GURIJALA necessarily fails to teach the complete combination recited in any dependent claim of Claims 1 or 16. Thus, each of claims 2-15 and 17-25 is allowable for the reasons given above for Claims 1 and 16.

In addition, each of Claims 2-15 and 17-25 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time. Therefore, it is respectfully submitted that Claims 2-15 and 17-25 are allowable for the reasons given above with respect to Claims 1 and 16.

### III. CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicants respectfully submit that allowance of the pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

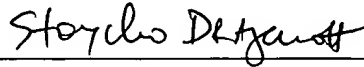
A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is

enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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Inventor: Fagundo et al. Attorney Docket No. 50325-0589  
Title: TECHNIQUES FOR NETWORK ADDRESS AND PORT TRANSLATION  
FOR NETWORK PROTOCOLS THAT DO NOT USE TRANSLATED PORTS  
WHEN REQUESTING NETWORK RESOURCES  
Application No.: 09/942,822 Confirmation No.: 9226 GAU: 2141  
ANNOTATED MARKED-UP DRAWING SHEET

## FIG. 5A

[[4]]500 NETBIOS-ENABLED NAPT PROCESS

510

PROCESS MESSAGES FOR REGISTERING RESOURCE NAME  
ON REMOTE NETBIOS NAME SERVER

550

PROCESS MESSAGES FOR RESOURCE  
ON LOCAL NETWORK